C-4

City of Parma

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305 N. 3rd Street
Parma, Idaho 83660

phone: (208) 722-5138
fax: (208) 722-5139
email: info@parmacityhall.net

US EPA Region 10
Attn: NPDES Permits Unit Manager
1200 6th Avenue
Suite 900 OWW-191
Seattle, WA 98101-3140

Re:City of Parma, Idaho — 2017 NPDES Permit No.: ID0021776 Schedule of Submissions

To Whom It May Concern,

The purpose of this letter is to provide written notification as part of the "Schedule of Submissions" required by our NPDES Permit found on Page 2 of the permit.

Through the help of its Engineering Consultant, the City of Parma has updated the following documents and has a copy located at the wastewater treatment site:

- Operations and Maintenance Manual (O&M) plan •
  Quality Assurance Plan (QAP) e Emergency Response
  and Public Notification Plan

All of these documents were prepared prior to the 180 day submission requirement which began on April 2017

If you have any questions regarding the enclosed, please give me a call at (208) 722-5138. Thank you.

Sincerely,

Nathan Leigh
Mayor, City of Parma

Cc.: Todd Crutcher, Idaho Department of Environmental Quality

Emergency Response and Public Notification Plan

Prepared for:

City of Parma

September 2017

Prepared by:

T-O Engineers Inc.

T-O ENGINEERS

I. Purpose of the Document

The Emergency Response and Public Notification Plan (ERP) is developed to identify measures to protect the public health from overflows that may endanger health and unanticipated bypasses or upsets that exceed any effluent limitations established in the facility's NPDES permit. This manual is designed to provide a wastewater system with a standardized response and recovery protocol to minimize and mitigate damage resulting from emergencies or disasters of man-made or natural origin.

This plan will also define threats to the City of Parma Wastewater Treatment Plant (WWTP), the risk level associated with those threats, risk mitigation steps, and emergency operational instructions to correct any failures and limit their impact.

The emergency plan addresses the following steps associated with an Emergency Response:

- ✓ Rapidly restore wastewater service after an emergency
- ✓ Minimize system damage
- ✓ Minimize impacts to public health
- ✓ Minimize impacts to the local environment
- ✓ Provide wastewater system information to first responders and agencies
- ✓ Ensure effective communication between regulatory agencies.

If there is any immediate risk to human health and safety, including the health and safety of the operations personnel at the plant, emergency personnel should immediately be contacted by calling 911. The actions prescribed in this manual should in no way be construed as substitute actions for calling 911 in the event of emergencies which require paramedics, police, or fire department personnel.

II. Threat: Fire

A. Loss of power to the WWTP due to fire destroying transmission wires to the plant

a) Risk: Low

b) Mitigations:

a) Reduce fuel around power lines by City of Parma personnel clearing fire materials, advise homeowners to reduce fuel materials and contact Idaho Power to work out a fuel reduction schedule if it is within their areas of responsibility.

b) There is some possibility of grass fires during summer due to the high combustibility of ripe cheat grass.

c) Ensure that the gasoline-powered influent pump is fully serviced and reserve fuel is on hand to run it for an extended period until power can be restored.

d) Ensure local utilities information is on file and accurate utility maps are on hand.

c) Emergency Actions:

a) Run plant backup gasoline-powered influent pump until power is restored.

b) Ensure an adequate amount of fuel for the influent pump is maintained through the emergency operations. Ensure influent pump is in proper working order and create a service schedule.
c) Areas with a high degree of potential fuel may need to be mowed periodically.
d) Periodically check utility connections for emergency power operation.
e) Contact the appropriate agencies. IDEQ and EPA must be notified by telephone within 24 hours and written notice within 5 days as required in the NPDES permit (Section III.G and I.B.4).

B. Loss of plant operation due to fire in Cell 3 building

a) Risk: Low

b) Mitigations:

a) Ensure the facility is maintained in a safe manner with all possible fire hazards addressed and reduced.
b) Make certain all access roads are clear for emergency vehicles at all times.
c) Ensure that all fire extinguishers are serviced and certified for the types of possible fires. Create a service record and schedule.
d) Ensure building is free of any debris.

c) Emergency Actions:

a) Operate systems manually, if necessary.
b) Contact the appropriate agencies. IDEQ and EPA must be notified by telephone within 24 hours and written notice within 5 days as required in the NPDES permit (Section III.G and I.B.4). Begin damage assessment and develop a plan to restore operations.
c) If flow from Cell 3 to Rapid Infiltration (RI) beds is not possible, bypass flow to Cell 1 in accordance to O&M.

C. Loss of plant operation due to fire in the disinfection building

a) Risk: Low

b) Mitigations:

a) Ensure the facility is maintained in a safe manner with all possible fire hazards addressed and reduced.
b) Make certain all access roads are clear for emergency vehicles at all times.
c) Ensure that all fire extinguishers are serviced and certified for the types of possible fires. Create a service record and schedule.
d) Ensure overflow pipe from the RI beds to disinfection building is unclogged and free of debris.

c) Emergency Actions:

a) Operate systems manually, if necessary.
b) Contract the appropriate agencies. IDEQ and EPA must be notified by telephone within 24 hours and written notice within 5 days as required in the NPDES permit (Section III.G and I.B.4). Begin damage assessment and develop a plan to restore operations.

c) If flow from RI beds to Chlorination contact chamber is interrupted, bypass flow using the overflow pipe in accordance to O&M.
d) If normal operations cannot be reinstated soon then a portable sodium hypochlorite tank and temporary chemical pump which can be attached to the contact chamber in order to still meet NPDES permit limits.

III. Threat: Flood

A. Possible contamination of Sand Hollow Creek

a) Risk: Very Low

b) Mitigations: None

c) Emergency Actions:

a) Ensure the plant is operating within required standards.
b) Place sandbags to mitigate minor flooding. Keep all drains and culverts free of debris.
c) Elevate water sensitive equipment.
d) Issue a public notice and press release to residential users to limit wastewater discharge from showers, dishwashers, washing machines, and toilets.
e) Post a solicitation for volunteers to help with the operations if necessary.
f) If the flood causes unavoidable discharge of raw wastewater, IDEQ and EPA must be notified by telephone within 24 hours and written notice within 5 days as required in the NPDES permit (Section III.G and I.B.4)

B. Clogging of equipment due to excess sediment loads during flood

a) Risk: Very Low

b) Mitigations:

a) Regularly maintain equipment and inspect pipelines if any indication of clogging is present.
b) Periodically exercise valves and gates to allow bypass of clogged equipment.
c) Keep manual bar screen clean and free of debris in anticipation of higher than normal sand, grit, trash, and debris.

c) Emergency Actions:

a) If bar screen is clogged, bypass flow to cell 2 until bar screen is unclogged.
b) If lagoon effluent force main is clogged, bypass flow to Cell 1 until lagoon effluent force main is unclogged.
c) If sand filter effluent force main is clogged, bypass flow to disinfection contact chamber until sand filter effluent force main is unclogged.
d) The plant has sufficient automatic controls to continue operation unattended for three days or more, if necessary.
e) Closely monitor flow, if any violations occurred IDEQ and EPA must be notified by telephone within 24 hours and written notice within 5 days as required in the NPDES permit (Section III.G and I.B.4).

IV. Threat: Earthquake

A. Destruction of the WWTP

a) Risk: Very Low

b) Mitigations: None

c) Emergency Actions:

a) Develop a recovery plan with IDEQ and EPA.

B. Incapacitation of the WWTP

a) Risk: Very Low

b) Mitigations: None

c) Emergency Actions:

a) Develop a recovery plan with IDEQ and EPA.

V. Threat: Terrorism

A. Terrorist act disrupts normal operations of the WWTP

a) Risk: Very Low

b) Mitigations:

a) Watch for unusual activity during normal rounds.

c) Emergency Actions:

a) Develop a recovery plan with IDEQ and EPA.

B. Terrorist act permanently damages the WWTP

a) Risk: Very Low

b) Mitigations:

a) Watch for unusual activity during normal rounds.

c) Emergency Actions:

a) Develop a recovery plan with IDEQ and EPA.

VI. Threat: Power Outage

A. Loss of grid power to all systems at the WWTP

a) Risk: Very Low

b) Mitigations:

a) Ensure that the WWTP's backup gasoline-powered influent pump is fully serviced and adequate fuel is on hand to run it for an extended period until power can be restored.

c) Emergency Actions:

a) In the event of a power outage, the backup gasoline-powered influent pump will be turned on with a push-on electric start.

b) The plant has sufficient flow capacity for three days or more without discharging to the Sand Hollow Creek, if necessary.

c) Work with Idaho Power to develop a schedule when power will be restored.

VII. Threat: Biological System Upset

A. Toxic shock or loading shock kills the biological system

a) Risk: Very Low

b) Mitigations:

a) Perform regular monitoring of influent to identify changes in toxicity and loading. Establish a "normal" baseline for operating conditions.
b) Monitor aerators performance.
c) Communicate with operation personnel regarding changes in waste discharge.
d) Ensure early upset identification measures are in place and working as intended.

c) Emergency Actions:

a) Implement maintenance services in aerators as required.
b) If biological system is killed, first notify EPA and IDEQ by telephone within 24 hours and written notice within 5 days as required in the NPDES permit (Section III.G and I.B.4).
c) Develop a recovery plan with the consulting engineer and with IDEQ.

VIII. Threat: Rapid Infiltration Beds Failure

A. Clogging of Undrain System

a) Risk: Low

b) Mitigations: None

c) Emergency Actions:

a) Monitor effluent regularly to assure that underdrain system is working properly.
b) Bypass flow to disinfection contact chamber if undrain system is completely clogged.

IX. Threat: Disinfection System Failure

A. Ineffective disinfection of effluent prior to discharge into Sand Hallow Creek

a) Risk: Low

b) Mitigations:

a) Monitor performance of disinfection system
b) Perform maintenance of the chemical pumps as prescribed by the equipment O&M.

c) Emergency Actions:

a) If one chemical pump fails, the other will automatically start.
b) If both chemical pumps fail and cannot be restarted, notify EPA and IDEQ by telephone within 24 hours and written notice within 5 days as required in the NPDES permit (Section III.G and I.B.4).

X. Threat: Mismanagement

A. Improper operation of the WWTP

a) Risk: Low

b) Mitigations:

a) Ensure all operators are fully trained and are under supervision of a licensed WWTP operator with required Class level.

b) Ensure all standard plant operations and procedures are followed.

c) Emergency Actions:

a) Correct deficient operations and practices.

b) Evaluate if effluent quality and standards were met during this period.

c) If effluent quality and standards were not met during this period, notify EPA and IDEQ by telephone within 24 hours and written notice within 5 days as required in the NPDES permit (Section III.G and I.B.4).

d) Provide counseling and remedial training to operators.

XI. Emergency Notification Procedures

This plan provides contact information for appropriate personnel, agencies and other affected public and private entities that must be notified in the event of an emergency.

Incident Command System Model

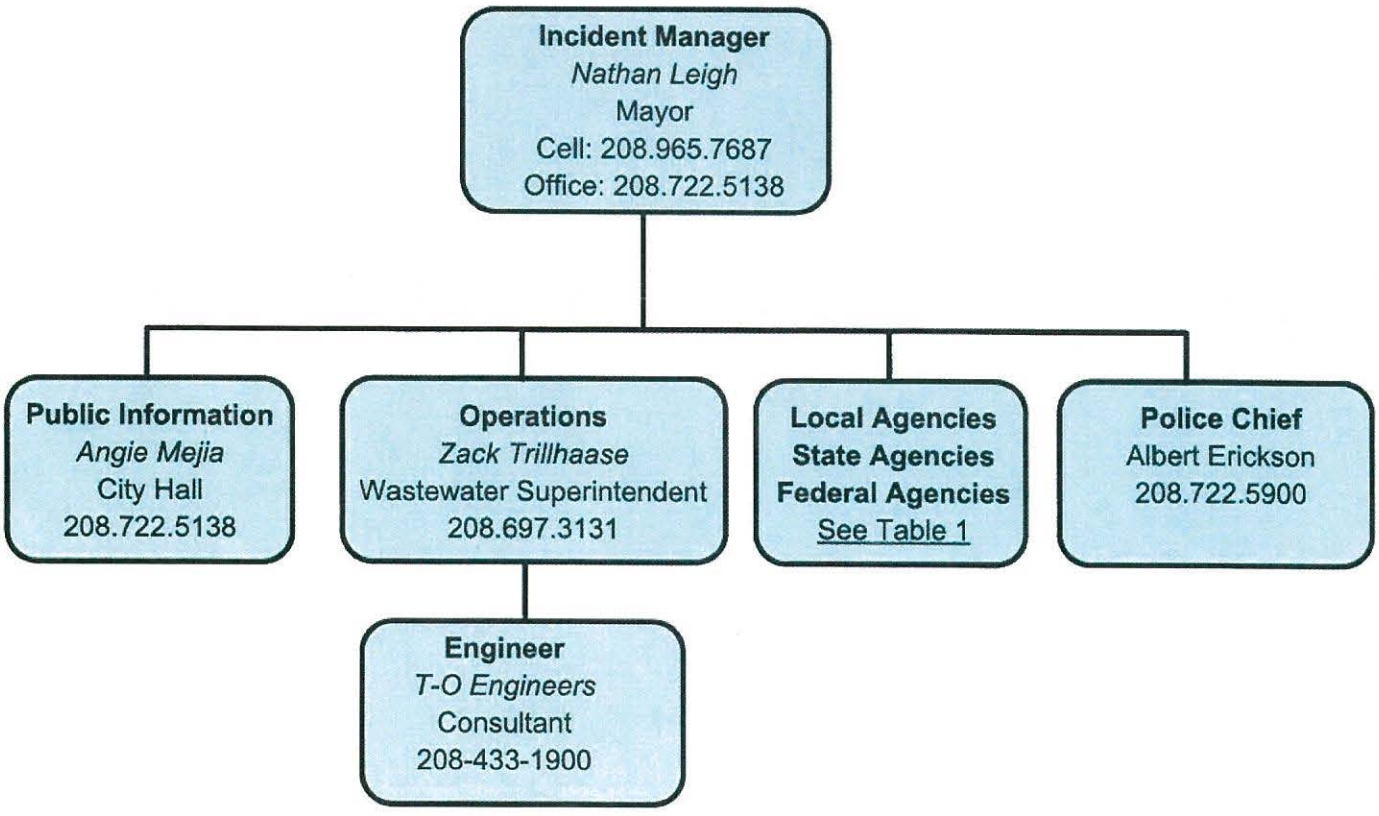

Table 1 - Agencies Contact Information

Local Police	Albert Erickson	Police Chief	Office: 208.722.5900
Fire Department	James Cook	Fire Chief	Office: 208.573.1203
Power Company	Idaho Power		1.800.488.6151
COUNTY AGENCIES			
Southwest District Health Department	Brian Crawford	Director of Environmental Health	Office – 208-455-5400
Payette County	Lt. David J. Schorzman	Emergency Management Coordinator	Office: 208.454.7271 Cell: 208.989.2132
STATE AGENCIES			
IDEQ	Todd Crutcher	Engineering Manager	Office: 208.373.0550
Department of Water Resources	Tim Luke	Compliance Bureau Chief	Office: 208.287.4959
Department of Fish and Game	Joe Kozfkay	Fisheries Regional Manager	Office: 208.465.8465
FEDERAL AGENCIES			
EPA	NPDES Compliance Hotline		Office: 206.553.1846